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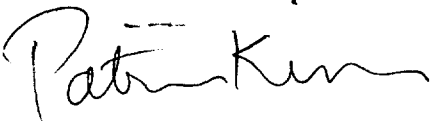
Elizabeth Yetley, Ph.D.
Office of Special Nutritionals
Center for Food Safety and Applied Nutrition
Food & Drug Administration
200 C Street SW
(HFS-450)
Washington, D.C. 20204

Dear Dr. Yetley:

This letter is to notify you that we are offering for sale Phytonutrient Based Iron Free Multi as a dietary supplement. It contains the following structure/function statement: "Provides Basic Nutritional Support Without Iron".

Our label contains the proper disclaimer as well.

Thank you.



Patricia Kim
Technical Nutrition Assistant

PK/jlh

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